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13  
14 **UNITED STATES DISTRICT COURT**  
15 **NORTHERN DISTRICT OF CALIFORNIA**  
16 **OAKLAND**

17 CISCO SYSTEMS, INC., a California  
18 Corporation, CISCO TECHNOLOGY, INC.,  
a California Corporation

19 Plaintiffs,

20 v.

21 WILSON CHUNG, JAMES HE, JEDD  
22 WILLIAMS, and THOMAS PUORRO,  
individuals, and PLANTRONICS, INC. dba  
23 POLY, a Delaware Corporation

24 Defendants.

Case No. 4:19-CV-07562

**STIPULATION REGARDING  
SUMMARY JUDGMENT BRIEFING**

**STIPULATION REGARDING SUMMARY JUDGMENT BRIEFING**

Pursuant to Local Rule 6-2, Plaintiffs Cisco Systems, Inc. and Cisco Technology, Inc. (collectively, “Cisco”), and Defendant Thomas Puorro (“Mr. Puorro”) by and through their respective counsel of record, hereby stipulate, subject to the Court’s approval, to extend the deadlines in the operative case schedule (D.I. 216), as follows:

Event	Current Deadline	New Deadline
Deadline for Cisco to File Opposition to Mr. Puorro’s Motion for Summary Judgment	December 7, 2022	December 14, 2022
Deadline for Mr. Puorro to File Reply for Summary Judgment	December 21, 2022	January 4, 2023

Pursuant to Local Rule 6-2, the attached Declaration of Sumeet Dang, filed concurrently herewith, sets forth with particularity the reasons for the requested enlargement of time; discloses all previous time modifications in the case, whether by stipulation or Court order; and describes the effect the requested time modification would have on the schedule for the case.

Respectfully submitted,

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*Attorneys for Defendant Thomas Puorro*

1           **PURSUANT TO STIPULATION, IT IS SO ORDERED** that the pretrial schedule is  
2 amended, and the new pretrial schedule is as stipulated by the Parties above.

3  
4 Dated: December 6, 2022

/s/ Phyllis J. Hamilton

5 Hon. Phyllis J. Hamilton  
6 United States District Judge  
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24 Defendants.

Case No. 4:19-CV-07562

**DECLARATION OF SUMEET DANG  
IN SUPPORT OF STIPULATION  
REGARDING SUMMARY JUDGMENT  
BRIEFING**

1 I, Sumeet Dang, declare as follows:

2 1. I am an associate with the law firm of Desmarais LLP, attorneys for Plaintiffs Cisco  
3 Systems, Inc. and Cisco Technology, Inc.

4 2. If called as a witness, I could and would competently testify to the following facts,  
5 which are known to me of my own personal knowledge.

6 3. Cisco and Mr. Puorro are engaged in settlement discussions that, if successful,  
7 would fully and completely resolve Cisco's claims against Mr. Puorro.

8 4. Cisco and Mr. Puorro agree that a one-week extension to Cisco's opposition to Mr.  
9 Puorro's motion for summary judgment would facilitate those ongoing settlement discussions.

10 5. Pursuant to Local Rule 6-2(a)(2), the Court has previously issued the following  
11 time modifications in this case: Dkt. 19 (Dec. 11, 2019 stipulation extending Mr. He's deadline to  
12 respond to Complaint to Jan. 9, 2020); Dkt. 33 (Jan. 9, 2020 stipulation extending Mr. He's  
13 deadline to respond to First Am. Compl. ("FAC") to Feb. 10, 2020); Dkt. 34 (Jan. 17, 2020  
14 stipulation extending Dr. Chung's deadline to respond to FAC to Feb. 10, 2020); Dkt. 103 (June  
15 4, 2020 Order extending Defendants' deadline to respond to Plaintiffs' Motion for Protective Order  
16 to June 5, 2020); Dkt. 140 (Sept. 15, 2020 stipulation extending Plaintiffs' deadline to respond to  
17 Administrative Motion to Seal to Sept. 21, 2020); Dkt. 145 (Sept. 24, 2020 stipulation extending  
18 Plaintiffs' deadline to respond to Motion for Protective Order and Motion to Strike to Oct. 1, 2020);  
19 Dkt. 153 (Oct. 6, 2020 stipulation extending Defendants' deadline to respond to Administrative  
20 Motion to File Under Seal to Oct. 12, 2020); Dkt. 195 (November 9, 2021 order granting motion  
21 to extend pretrial case schedule by approximately 120 days); Dkt. 216 (April 4, 2022 order granting  
22 stipulation to extend case schedule by approximately 100 days); Dkt. 223 (July 1, 2022 order  
23 approving stipulation to extend period for depositions by approximately 30 days); Dkt. 227 (July  
24 28, 2022 order approving stipulation to extend expert report deadlines by approximately one  
25 week).

26 6. The parties' proposed extension would not result in changing any subsequent case  
27 deadlines currently set by the Court.  
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Dated: December 5, 2022

/s/ Sumeet Dang

Sumeet Dang